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Food Safety And Inspection Service
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AUDIT REPORT FOR ENGLAND

FEBRUARY 11 THROUGH FEBRUARY 19, 2002

INTRODUCTION

Background

This report reflects information that was obtained during an audit of England's meat/poultry inspection system from February 11 through February 19, 2002. All three establishments certified to export meat to the United States were audited. One of these was a slaughter establishment, one a cutting establishment, and one was a cold storage.

The last audit of the England meat inspection system was conducted in May 2000. Five establishments were audited. The auditor found significant problems in one establishment (Est. 2060) that was then designated as marginal/re-review at the next audit. The major concerns at that time were the following:

1. Inadequate prevention of contamination (Ests. 20, 2060, and 2134). *Contamination prevention was again not adequate in Ests.2060 and 2134.*

2. Inadequate hand-washing facilities (Ests. 2060 and 2134). *This deficiency was adequately addressed and corrected by both establishments.*

3. Inadequate light at inspection stations (Est. 2060). *This problem was properly addressed and corrected.*

4. Neglected maintenance and cleaning of over product equipment (Est. 2060). *The establishment management corrected this deficiency.*

5. Swine were not observed from both sides in motion during ante-mortem inspection (Est. 2060). *This deficiency was still observed and discussed with Meat Hygiene Service (MHS) officials and will be addressed and corrected in the near future.*

6. The issue of the 28-day turnaround time for routine residue analyses was referred to the Office of Policy, Program Development, and Evaluation for equivalence determination and equivalence was granted.

7. The requirement for supervisory visits to all establishments certified as eligible to export to the U.S. was discussed in detail. *This was properly performed by the*

MHS representatives, when exporting to the U.S. England was presently not an active exporter to the U.S., because of Foot and Mouth Disease restriction.

Among the deficiencies identified during this new audit were the following:

1. Pre-operational sanitation deficiencies,
2. Ante-mortem and post-mortem inspection deficiencies, and
3. Trimming deficiencies of grease-contaminated meat

Importation of beef or beef products was not allowed at the time of this audit due to the presence of Bovine Spongiform Encephalopathy (BSE) in the United Kingdom. APHIS has not declared England free of Classical Swine Fever (Hog Cholera) for the counties of Essex, Norfolk, and Suffolk. Office of International Epizootics (OIE) did declare England free of Foot and Mouth Disease but APHIS had not, at the time of this audit. No poultry establishments were certified as eligible to export to the United States.

During calendar year 2001, England establishments exported 830,572 pounds of pork carcasses and cuts to the U.S. There was no port-of-entry (POE) rejection for the above-noted year.

PROTOCOL

This on-site audit was conducted in three parts. One part involved visits with England national meat/poultry inspection officials to discuss oversight programs and practices, including enforcement activities. The second was conducted by on-site visits to establishments. The third was a visit to two private laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella*.

England's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in the three establishments audited; one of these (Est. 2060) was issued a 30-day letter requiring completed correction of the SSOP deficiencies and associated documentation. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As stated above, seven major concerns had been identified during the last audit of the England meat inspection system conducted in May 2000. During this new audit, the auditor determined that the concerns had been addressed and corrected, except for the ante-mortem inspection performed in Establishment 2060 and contamination prevention in Ests. 2060 and 2134.

Entrance Meeting

On February 11, 2002, an entrance meeting was held in the London offices of the Department for Environment, Food and Rural Affairs (DEFRA) and was attended by Mr. Nigel Gibbens, Deputy Head, Veterinary International Trade Team, DEFRA; Dr. Alistair Booth, Veterinary Meat Hygiene Advisor, Food Standards Agency (FSA); Mr. Simon Hall, Veterinary Advisor, Veterinary International Trade Team, DEFRA; Mr. Steve Knight, Agricultural Economist, American Embassy, London; Mr. Steve McDermott, Equivalence Staff Officer, Office of Policy, Program Development and Evaluation (OPPDE), FSIS; and Dr. Oto Urban, International Audit Staff Officer, FSIS. Topics of discussion included the following:

1. The audit itinerary and lodging accommodations were finalized.

2. The review of the governmental oversight of the U.S. export approved establishments by the Equivalency Staff Officer was explained.

3. The auditor provided copies of the data-collection instruments he would be using in the audits of the individual establishments (Attachments A, B, C, and D).

Headquarters Audit

The Department for Environment, Food & Rural Affairs (DEFRA), formerly the Ministry of Agriculture, Fisheries and Food, is the central competent authority legislated to enforce Great Britain's meat and poultry inspection regulations. DEFRA carries out its meat and poultry inspection responsibilities by contracting the services of the Food Standards Agency (FSA), a government agency within Great Britain's Department of Health. Through direction from DEFRA, FSA regulates Great Britain's exports of meat and poultry to the United States.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted in the inspection service offices at the audited establishments. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.

No concerns arose as a result the examination of these documents.

Government Oversight

The Meat Hygiene Service (MHS), an executive agency of FSA, provides the government veterinarians and inspectors for "approved" meat and poultry establishments (domestic and exporting) by either direct hiring or through contract services. All official veterinarians assigned to the three British establishments currently certified to export to the United States are on contract to MHS. Nearly all official inspectors are MHS employees. The remaining official inspectors are obtained through the same contract services with official veterinarians. Veterinarian contracts are reviewed annually and renewed every three years by FSA. FSA has the authority to cancel the contracts with veterinarians at any time deemed necessary. All official veterinarians and inspectors receive no remuneration for official British inspection services from either industry or establishment personnel.

The official veterinarians and inspectors report directly to the Principal Official Veterinary Surgeons (POVS), which are stationed throughout Great Britain and are full-time employees of MHS. The POVSs report directly to FSA supervisors stationed in field locations, who in turn report directly to DEFRA.

For establishments certified to export to the United States, FSA provides instructions and training to official veterinarians and inspectors regarding U.S. import requirements. FSA also assists DEFRA regarding the licensing of exporting establishments.

Regarding the government oversight of the chemistry laboratory conducting analyses for products being exported to the United States, this function is carried out by the Veterinary Medicines Directorate (VMD), an executive agency of DEFRA. VMD also oversees the approval and use of veterinarian drugs in the United Kingdom. The FSA performs government oversight of the microbiology laboratory conducting analyses for U.S.-destined product.

Establishment Audits

Three establishments (2060, 2134, and 2182) were certified to export meat products to the United States at the time this audit was conducted. No poultry establishments were currently certified for U.S. export. All three establishments were visited for on-site audits, and both MHS inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products, except in two establishments, where instances of direct product contamination were observed (See Sanitation Controls section).

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories; intra-laboratory quality assurance procedures, including sample handling; and methodology.

The Laboratory of the Government Chemist in Teddington, Surrey was audited on February 18, 2002. In spite of the official name of the laboratory, it was not owned or operated by the agencies involved with the meat inspection service, but rather was privately owned. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, acceptable method for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done (this was not a deficiency).

The laboratory was not testing for arsenic, which is tested for in the U.S. The choice of tissue for DES testing was bile and urine.

England's microbiological testing for *Salmonella* was being performed in a private laboratory, Allied Laboratory Services Ltd., in Grimsby. It was audited on February 12, 2002. The auditor determined that the system met the criteria established for the use of private laboratories under FSIS's Pathogen Reduction/HACCP rule. These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.

2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and establishment.

No concerns arose as a result of the audit of this laboratory.

Establishment Operations by Establishment Number

The following operations were being conducted in the three establishments:

Pork slaughter, cutting, and (not for U.S. export) boning and cooked hams (Est. 2060)
Pork cutting, and boning and (not for U.S. export) curing (Est. 2134)
Cold storage facility (Est. 2182)

SANITATION CONTROLS

Based on the on-site audits of establishments, England's inspection system had controls in place for water potability, chlorination procedures, back-siphonage prevention, sanitizers, establishments separation, pest evidence, control program and monitoring, temperature control, lighting, operation and inspection work place, ventilation, facilities approval, other product areas, antemortem facilities, welfare facilities, equipment sanitizing, product reconditioning, product transportation, effective maintenance program, operational sanitation and waste disposal.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations, except in Establishment 2060, where SSOP pre-operational deficiencies were observed. The following variations were observed:

1. The records of SSOP procedures did not indicate any preventive action (Ests. 2060 and 2134). Establishment officials scheduled these deficiencies for correction.
2. The SSOP preventive measures were written but not implemented in all cases and there was a general statement of individuals responsible for cleaning procedures, not a description of each cleaning procedure (Est. 2182). These deficiencies were scheduled for correction by the establishment.

Cross-Contamination

1. The knife sharpener was observed to contact the trimmer's boots in Est. 2060. This deficiency was corrected immediately by the establishment management officials.

2. Several plastic curtains with potential of contacting exposed product were observed in Est. 2134. The establishment officials scheduled this deficiency for correction.

Sanitary dressing procedures

1. Fecal contamination was observed on one carcass out of 15 in the cooler (Est. 2060). Establishment management officials performed the proper corrective action.

2. The employee responsible for removing viscera was observed to contaminate offals with his boots and also allowed the offal to contact the floor (Est. 2060). This deficiency was corrected immediately by the establishment officials.

Over-product equipment

1. Condensation was observed on the rail over exposed product in the chiller (Est. 2060). This deficiency was corrected immediately by the establishment officials.

2. Grease from rails and other sources was observed on several carcasses and in boxed trimmings (Est. 2134). The establishment has a policy of continuous trimming but not a trimming station at which carcasses should be trimmed. This was scheduled for correction by both the inspection service and establishment management.

Over-product ceiling

1. Condensation was observed over boning tables with exposed product (Est. 2134). The inspection service and establishment management performed proper immediate corrective action.

2. A leaking pipe was observed in close proximity to the product processing area in the boning room (Est. 2134). The establishment officials performed proper immediate corrective action.

Hand-Washing Facilities

There was no waste basket at the hand wash station in the product inspection room (Est. 2182). This deficiency was corrected immediately by the establishment official.

Pre-operational sanitation

There was a failure of the pre-operational sanitation in several areas of Est. 2060, which was issued a 30-day letter requiring completed correction of the SSOP deficiencies and associated documentation. Oil, hair, fat, dry meat and grease were observed on product-contact equipment in the processing areas. Except in two cases, corrective action was performed immediately by establishment management. Two cases of corrective action that were not immediately performed included a liner in the box contacting the wall and a carcass splitting saw which was in the close proximity of the floor, with a potential for the saw contamination.

ANIMAL DISEASE CONTROLS

With the exceptions listed below, England's inspection system had controls in place to ensure adequate animal identification, dispositions, restricted product control, and procedures for sanitary handling of returned and rework product.

1. Moving animals were observed by the veterinary inspector from one side and by the establishment official on the other side during the ante-mortem inspection. According to European Council Directive 64/433 article 3 (c), the official veterinarian should inspect animals. This deficiency was scheduled for correction.

2. Mesenteric lymph nodes were not inspected by the veterinary inspection on post-mortem inspection. The supervisory veterinarian immediately corrected this deficiency.

3. A metal car for storage of condemned product was not properly identified. This was scheduled for correction by the inspection service and the establishment management.

It was reported that Great Britain had Foot and Mouth Disease outbreaks since the previous U.S. audit. OIE did declare Great Britain free of Foot and Mouth Disease but APHIS had not, at the time of this audit.

Importation of beef or beef products was not allowed at the time of this audit due to the presence of BSE in the United Kingdom. APHIS has not declared England free of Classical Swine Fever (Hog Cholera) for the counties of Essex, Norfolk, and Suffolk.

RESIDUE CONTROLS

England's National Residue Testing Plan for 2002 was being followed, and was on schedule. The English inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.

SLAUGHTER/PROCESSING CONTROLS

The English inspection system had controls in place to ensure disposition of dead, dying, diseased or disabled animals, humane handling and slaughter, pre-boning trim, boneless meat reinspection, ingredients identification, packaging materials, and laboratory confirmation.

HACCP Implementation

All establishments approved to export meat/poultry products to the U.S. are required to have developed and implemented a Hazard Analysis Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were found to meet the basic FSIS regulatory requirements except for the following:

- Several HACCP implementation deficiencies were observed in Est. 2134. Accordingly, the Critical Control Point (CCP) [metal detector] referenced in the HACCP plan was based on the purchaser's quality standard for size of acceptable metal particles and not on public health risk. Additionally, validation was not properly performed, and observations were responding to a non-CCP rather then taking corrective action when deviation from the CCP occurs. Establishment officials scheduled these

deficiencies for correction.

Testing for Generic *E. coli*

England had adopted the FSIS regulatory requirements for generic *E. coli* testing.

One establishment audited was required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and was audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements, except that Establishment 2060 was using the sponging method for *E. coli* sampling but they did not develop their own statistical process control and were using an excision method criteria for evaluation of their results.

Additionally, establishments had adequate controls in place to prevent meat products intended for England domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The MHS inspection system controls [control of restricted product and inspection samples, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

One establishment audited (Est. 2060) was required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

England has adopted the FSIS regulatory requirements for *Salmonella* testing with exception of the following equivalent measures:

1. SAMPLE COLLECTOR: Establishment Takes Samples. The criteria used for equivalence decisions for use of establishment employees in lieu of government employees are:
   - There is a clearly written sampling plan with instructions for sample collection and processing that will be universally followed.
   - The government has a means of ensuring that establishment sample collection activities are appropriate.
   - The government uses test results to monitor establishment performance over time.
   - The government takes immediate action any time an establishment fails to meet a *Salmonella* performance standard.

2. LABORATORIES: A private Laboratory in Grimsby has been used. The criteria used for equivalence decisions for the use of private laboratories in lieu of government laboratories are:
   - The laboratory is accredited/approved by the government, accredited by a third-party accrediting organization with oversight by the government, or a government contract laboratory.
   - The laboratory has properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
   - Results of analyses are being reported to the government or simultaneously to the government and establishment

Species Verification Testing

At the time of this audit, England was not exempt from the species verification-testing requirement, yet the verification had been discontinued. English government officials had officially requested an exemption, but a decision had not yet been made by FSIS. England has ceased to export to the United States for approximately one year due to APHIS restrictions regarding Foot and Mouth Disease. English government officials indicated that species testing would occur once exports resumed and an exemption had not yet been granted.

Monthly Reviews

Monthly reviews were being performed by Principal Official Veterinary Surgeons (POVS). All were veterinarians with in-plant experience, and were promoted to this position within the organization. All had received special instruction and on-going training in foreign requirements.

The internal review program was being applied equally to both export and non-export establishments but the one month time frame is maintained only for the U.S. export certified establishments. Internal review visits were not announced to establishment personnel, while inspection personnel were given advance notice. These reviews were conducted by single individuals, at least once a month. The records of audited establishments were kept in the inspection offices of the individual establishments, copies were kept in the regional offices, and were routinely maintained on file for a minimum of one year. This is the procedure when England is actively exporting to the U.S.

Due to the FMD outbreak, England was currently not exporting any product to the U.S., and was not performing monthly supervisory reviews. This would begin once exports resumed.

According to Section 327.2 (a)(2)(iv)(a) and (b) of Title 9 of the U.S. Federal Code of Regulation, supervisory visits and written reports of the results, are required to be made to all establishments certified as eligible to export to the U.S., and they are to be made at least monthly, except during a period when the establishment is not operating or is not engaged in producing products for exportation to the U.S.

Enforcement Activities

DEFRA is the central competent authority legislated to enforce Great Britain's meat and poultry inspection regulations. DEFRA carries out its meat and poultry inspection responsibilities by contracting the services of the Food Standards Agency (FSA), a government agency within Great Britain's Department of Health. Through direction from DEFRA, FSA regulates Great Britain's exports of meat and poultry to the United States. The Meat Hygiene Service (MHS), an executive agency of FSA, provides the government veterinarians and inspectors for "approved" meat and poultry establishments (domestic and exporting) by either direct hiring or through contract services.

England's Enforcement and Food Standard Group included two divisions to help local authorities improve the effectiveness of local enforcement of food standards legislation and to help consolidate and further develop the work on enforcing food laws. The first of the two divisions, the Local Authority Enforcement (Policy) Division, set standards for local authorities' enforcement of food laws and monitors their performance against those standards. The other, the Local Authority Enforcement (Support) Division, worked with local authority enforcement services to improve standards by providing advice, guidance, and training on technical, professional, and legislation issues, and furthermore took over responsibility for the existing food hazard warning system, policy on statutory enforcement powers, and import controls on fish and food of non-animal origin.

The Meat Hygiene Service was responsible for standards of meat hygiene in all licensed establishments.

The Food Labeling, Standards and Consumer Protection Division managed a program of surveys and investigations to check the level of food adulteration, "misdescription," and fraud, and ensured that food met appropriate quality standards.

The Food Emergencies Unit developed standards and protocols for the Food Standards Agency's handling of emergencies and developed generic risk-management approaches for use in internal incident plans.

Exit Meetings

An exit meeting was conducted in London on February 19, 2002. The participants included Mr. Robert Bell, Head, Veterinary International Trade Team, (DEFRA); Dr. Alistair Booth, Veterinary Meat Hygiene Advisor, Mr. Steve Knight, Agricultural Economist, American Embassy, London; Mr. Steve McDermott, Equivalence Staff Officer, FSIS; and Dr. Oto Urban, International Staff Officer, FSIS. The following topics were discussed:

1. Pre-operational sanitation deficiencies in several areas of Establishment 2060 were discussed, including the 30-day letter that was issued. Oil, hair, fat, dry meat and grease were observed on the product-contact equipment in the processing areas. Except in two cases, corrective action was performed immediately by establishment management. MHS officials promised improved monitoring and verification of pre-operational sanitation procedures.

2. MHS officials gave assurances that they would ensure follow-up monitoring of the effectiveness of corrective actions taken in the field regarding the problems of deficient personal hygiene practices, condensation control, and cross-contamination.

3. "Zero tolerance" for fecal contamination was stressed. MHS officials reconfirmed their commitment to monitor this critical deficiency.

4. Sanitary dressing procedures, offal contamination by an establishment employee. The preventive action was promised by the inspection service.

5. Grease from over-product equipment contaminating product, and the suggestion of adding a trim station for the contaminated product was discussed. Prompt compliance was promised.

6. Ante-mortem and post-mortem inspection procedure deficiencies and missing "condemned" labeling were discussed. The MHS officials promised corrective action.

7. No requirement for arsenic residue testing and different tissue (urine & bile) used for DES analysis was discussed.

8. The use of the sponging method for *E. coli* sampling but not developing its own statistical process control and using excision method criteria for evaluation of the *E. coli* test results. Corrective action was promised by MHS officials.

CONCLUSION

The inspection system of England was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Three establishments were audited: one establishment was issued a 30-day letter due to the SSOP pre-operational sanitation deficiencies.

The other deficiencies encountered during the on-site establishment audits were adequately addressed to the auditor's satisfaction before the termination of each audit.

Dr. Oto Urban (signed) *Dr. Oto Urban*
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Forms
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
2060	√	√	√	√	√	√	√*	√
2134	√	√	√	√	√	√	√*	√
2182	√	√	√	√	√	√*	√*	√

*2060 – 7. The preventive action was missing.
*2134 – 7. The preventive action was missing.
*2182 – 7. The SSOP preventive measures were written but not implemented in all cases. *2182 – 6. There was a general statement of individuals responsible for cleaning procedures, not an identification on each cleaning procedure.

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10.Adequate documentation	11. Dated and signed	12.Pre-shipmt. doc. review
2060	√	√	√	√	√	√	√	√	√	√	√	√
2134	√	√	√	√	√	√	√*	√	√*	√	√*	√
2182	√	√	√	√	√	√	√	√	√	√	√	√

The following HACCP program implementation deficiencies such as:

2134 – 7 Critical limits were not specified for physical hazard (metal detector).
2134 – 9 Not properly performed validation.
2134 – 11 Records with observations responding to a non-CCP.

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 2182, which was a cold-storage facility) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
2060	√	√	√	N/A	√	√	√	√	√*	√
2134	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2182	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

2060 – 9. The use of the sponging method for *E. coli* sampling but not developing its own statistical process controls and using excision method criteria for evaluation of the *E. coli* test results.

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
2060	√	√	N/A	√	√	√
2134	N/A	N/A	N/A	N/A	N/A	N/A
2182	N/A	N/A	N/A	N/A	N/A	N/A